ARASTO FARSAD (SBN: 273118) NANCY WENG (SBN: 251215) 2 FARSAD LAW OFFICE, P.C. 1625 The Alameda, Suite 525 3 San Jose, CA 95126 Tel: 408-641-9966 Fax: 408-866-7334 5 Email addresses: nancy@farsadlaw.com; farsadlaw1@gmail.com 6 Attorneys for Plaintiff 7 RAJAŇÍ KOLLI 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION 10 Case No. 20-51735 SLJ In re: 11 Chapter 11 12 VIKRAM SRINIVASAN, AP Case No. 21-05007 13 Debtor, PLAINTIFF'S REQUEST FOR ENTRY 14 OF ORDER BY DEFAULT; 15 **CERTIFICATE OF SERVICE** 16 RAJANI KOLLI, Judge: Hon. Stephen L. Johnson 17 Plaintiff, 18 19 v. 20 VIKRAM SRINIVASAN, 21 22 Defendant. 23 24 TO THE CLERK OF THE COURT: Comes now the Plaintiff in the above 25 referenced case, Rajani Kolli, by and through his counsel, Farsad Law Office, P.C., and hereby 26 requests that the Clerk enter the default of the Defendant named herein (VIKRAM 27 SRINVASAN) regarding the Plaintiff's ADVERSARY COMPLAINT FOR 28

Plaintiff's Request for Entry of Order by Default; Certificate of Service - 1

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NONDISCHARGEABILITY OF DEBT PURSUANT TO 11 U.S.C. §§ 523(A)(2), (A)(4), AND (A)(6) (the "Complaint") (Dkt. No. #1).

### A. REQUEST FOR ENTRY OF DEFAULT BY PLAINTIFF

- 1. On March 22, 2021, a summons was issued in this case.
- 2. On <u>March 22, 2021</u>, the summons and Complaint were properly and timely served on VIKRAM SRINIVASAN, Defendant in this adversary proceeding.
- 3. Service on said Defendant was made within 7 days of the date that the Summons was issued. The Defendant so served was required to file an answer or other responsive pleading to said complaint or a motion pursuant to Federal Rule of Bankruptcy Procedure 7012 on or before **April 21, 2021**.
- 4. The Defendant so served did not file an answer, a motion, or other responsive pleading by that date, or by the date set in an extension of time, if any.

### B. <u>DECLARATION OF PROPER PROOF OF SERVICE</u>

5. The Defendant is an individual. Service was effected in compliance with Fed. R. Bankr. P. 7004 (b)(1). (See Docket No. 6.)

# C. <u>DECLARATION REGARDING AGE AND COMPETENCY OF DEFENDANT ALONG WITH DECLARATION RE NONMILITARY STATUS</u>

- 6. The Defendant is not an infant or incompetent person and the Defendant named in this request is not entitled to the benefits of the Service-members Civil Relief Act of 2003. (50 App. U.S.C.A. 501 et seq.)
- 7. Accordingly, for all of the reasons stated above, I request that the default be entered against the Defendant named herein.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2021, at San Jose, California. Respectfully submitted, FARSAD LAW OFFICE, P.C. /s/ Arasto Farsad Arasto Farsad, Esq.
Attorneys for Plaintiff 

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#### **CERTIFICATE OF SERVICE**

I am at least 18 years of age. My business address is Farsad Law Office, P.C., 1625 The Alameda, Suite 525, San Jose, CA 95126. On <u>May 6, 2021</u>, I served the following interested parties with the document described as follows:

## 1. PLAINTIFF'S REQUEST FOR ENTRY OF ORDER BY DEFAULT; AND CERTIFICATE OF SERVICE

**BY USPS FIRST CLASS MAIL:** by placing true copies thereof in sealed envelopes with postage fully prepaid in the United States mail from San Jose, California, to all parties on the attached **creditor court matrix / service list** as well as the addressees listed below:

Mr. Vikram Srinivasan 440 Dixon Landing Road G201 Milpitas, CA 95035

Mr. Geoff Wiggs, Esq. Law Offices of Geoff Wiggs 1900 South Norfolk St. #350 San Mateo, CA 94403-1171

**BY NOTICE OF ELECTRONIC FILING**: I caused to be served the above-described document(s) by means of electronic transmission of the Notice of Electronic Filing through the Court's transmission facilities, to the following parties and/or counsel who are registered ECF users: *All CM/ECF registered participants in this case*.

Executed on May 6, 2021, at San Jose, California.

I declare under penalty of perjury that the above statements are true and correct.

FARSAD LAW OFFICE, P.C.

/s/ Arasto Farsad Arasto Farsad

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Label Matrix for local noticing 0971-5 Case 20-51735

California Northern Bankruptcy Court

San Jose

Thu May 6 17:16:14 PDT 2021

Wedgewood, LLC Wedgewoo

2015 Manhattan Beach Blvd.

Ste. 100

Redondo Beach, CA 90278-1230

Civic Financial

2015 Manhattan Beach Blvd Redondo Beach, CA 90278-1226

(p) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

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280 S 1st St. #268 San Jose, CA 95113-3004

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Irvine, CA 92618-4969

Amelia Valenzuela WEDGEWOOD

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San Jose, CA 95113-3099

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Synchrony Bank

c/o PRA Receivables Management, LLC

P.O. Box 41021 Norfolk, VA 23541-1021

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Mitali Parmar

c/o Lubna K. Jahangiri, Esq. Jahangiri Law Group, APC 210 Porter Drive, Suite 230 San Ramon, CA 94583-1588

Rajani Kolli

c/o Farsad Law Office, P.C. 1625 The Alameda, Suite 525 San Jose, CA 95126-2224

United States Trustee US Department of Justice 950 Pennsylvania Ave, NW Washington, DC 20530-0009

Geoff Wiggs

Law Offices of Geoff Wiggs 1900 South Norfolk St. #350 San Mateo, CA 94403-1171

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Service Centralized Insolvency Operation PO Box 21126 Philadelphia, PA 19114-0326

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Vinod Nichani

(u) Courtesy NEF (d) Synchrony Bank

c/o PRA Receivables Management, LLC

PO Box 41021

Norfolk VA 23541-1021

(d) Wayne M Greenwald Wayne Greenwald, P.C. 475 Park Avenue S., 18th Fl New York, NY 10016-6901 End of Label Matrix
Mailable recipients 22
Bypassed recipients 4
Total 26

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